

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

In re AbbVie Inc., et al.

)
) Case No. 14-cv-1748
) Honorable Matthew F. Kennelly
)

This Document Relates to All Cases

DEFENDANTS' MOTION TO EXCEED PAGE LIMIT

NOW COMES Defendants in the above-captioned litigation requesting entry of an order permitting them to exceed the page limit for their memoranda in support of motions to dismiss and reply briefs. In support thereof, Defendants state as follows:

1. Local Rule 7.1 imposes a 15-page limit on briefs in support of or in opposition to any motion.
2. Defendants are moving to dismiss 39 complaints that are governed by the laws of 23 states. In light of the numerous arguments to be made with respect to the individual state laws, Defendants need more than fifteen pages to address all the issues. The additional pages will facilitate a complete and comprehensive review of the disputed issues.
3. During the initial status conference in this case, the Court recognized that an enlargement of the page limitations set forth in the Local Rules would be necessary, given the scope of the motions to dismiss.
4. Defendants propose a combined 55 pages total for their motions to dismiss, which would be divided into two briefs: a joint brief that is no more than 45 pages and a brief addressing any separate issues for any defendant that is no more than 10 pages.

Defendants propose the Plaintiffs get a combined 55 pages total for their response briefs and Defendants get a combined 30 pages total for their reply briefs.

5. On May 30, 2014, counsel for Defendants asked counsel for Plaintiffs if they would join this motion. Counsel for Plaintiffs stated that they “will stick with the default page limit.”

WHEREFORE, for the foregoing reasons, Defendants respectfully request this Court enter an Order granting Defendants leave to file two memoranda of law in support of their motions to dismiss that shall not exceed a total of 55 pages for both briefs, granting Plaintiffs a combined 55 pages total for their response briefs, and granting Defendants leave to file a reply brief not in excess of 30 pages, all excluding the cover page, table of contents, table of authorities, and signature block.

Dated: May 30, 2014

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Scott Ahmad, hereby certify that on May 30, 2014, the foregoing document was filed via the Court's CM/ECF system, which will automatically serve and send email notification of such filing to all registered attorneys of record.

/s/ Scott Ahmad